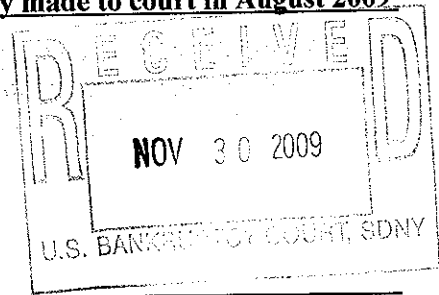


**No hearing is needed**

**Motion may be decided on submissions already made to court in August 2009**

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, N.Y. 10004-1408



**Lead Case # 09-50026**

In Re:	)	
	)	Chapter 11
MOTORS LIQUIDATION COMPANY, et. al	)	Case # 09-0950026
	)	(Gerber)
Debtors	)	Jointly Administered
(formerly General Motors Corp. et. al.)	)	November 23, 2009

**RENEWED MOTION**

**TO GIVE ACCESS TO CERTAIN DOCUMENTS FILED UNDER SEAL AS WELL TO OTHER  
DOCKETED DOCUMENTS**

1.0 Comes now Radha R.M. Narumanchi, once again, a Creditor of GM and one of the appellants in the case<sup>1</sup> (appealing the decision and order dated 7-5-2009 issued by honorable Judge Gerber on Section 363 Sale). In my Motion before this court filed on 7-23-2009 (copy attached) I had informed this court that I designated the following documents in the said appeal:

A. Any depositions taken of: (1) Harry Parker, (2) Frederick Henderson, (3) William C. Repko, (4) J. Stephen Worth, (5) Albert Koch, and (6) Michael Raleigh<sup>2</sup>; and

B. Evidentiary Hearing Transcripts dated 6-30-2009 (Docket # 3087), 7-1-2009 (# 3205), and dated 7-2-2009 (# 3062).

2.0 Again, in my supplemental motion dated 8-5-2009 (copy attached), I brought it to the attention of this court that I had noticed two more depositions of **some unnamed individuals** that were filed under seal, vide docket #s 3287 and 3288 of the court, by attorney Jakubowski. If any of the depositions filed by him in the said sealed envelopes contained depositions of any of the individuals identified earlier, in my appeal, I wanted to have full access to them.

<sup>1</sup> My notice of appeal dated 7-7-2009 was docketed under # 3265, and my statement of issues and designation of contents dated 7-16-2009 was docketed under # 3266.


<sup>2</sup> It may be recalled here that as a *pro se* Creditor I was not given any access at all to any of the pre-evidentiary proceedings (that includes participating fully in depositions, discovery and requests for production of records) or even in the examination process of the witnesses during evidentiary hearings held on 6-30-2009, 7-2-2009 and 7-2-2009.

**3.0 This matter has been pending before the court, at least since 8-5-2009, i.e. more than 3-1/2 months, as the appeal is pending before the U.S. District Court for SDNY. Hence, I now request this Court to give suitable instructions to the court staff, as well as to the attorneys concerned, to make all the documents noticed above to be made available to me, without any hearing, and without any further responses from any of the other parties.**

Respectfully submitted.

Dated at New Haven, Conn. 06513, this 23<sup>rd</sup> day of November, 2009.

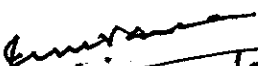
CREDITOR (Interested Party) & *Appellant Pro Se*

  
11/23/2009  
(Radha R.M. Narumanchi)  
657 Middletown Avenue  
New Haven, Conn. 06513  
Phone: (203) 562-0536  
Email: [rrm\\_narumanchi@hotmail.com](mailto:rrm_narumanchi@hotmail.com)

**Certification**

This is to certify that a copy of the aforementioned was mailed by first class mail, postage paid this 23rd day of November, 2009 to:

- 1) Weil, Gotshal & Manges LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, N.Y. 10153 - Attn: Harvey R. Miller/Stephen Karotkin/Joseph H. Smolinsky;
- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
- 5) Cohen, Weiss and Simon LLP, Attorneys for the UAW, 330 West 42<sup>nd</sup> Street, New York, N.Y. 10036 - Attn: Babette Ceccotti;
- 6) Vedder Price, P.C., Attorneys for Export Development Canada, 1633 Broadway - 47<sup>th</sup> Floor, New York, N.Y. 10019 - Attn: Michael J. Edelman/Michael L. Schein;
- 7) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> floor, New York, N.Y. 10004 - Attn: Diana G. Adams;
- 8) U.S. Attorney's General Office, S.D.N.Y., 86 Chambers Street - Third Floor, New York, N.Y. 10007 - Attn: David S. Jones/Matthew L. Schwartz.
- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 60601, Attn: Steve Jakubowski/Elizabeth Richert, and .
- 10) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408

  
11/23/2009  
(Radha R.M. Narumanchi)

Opposition briefs may be filed on or before 8-19-2009

No hearing is needed

Motion may be decided on submissions

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, N.Y. 10004-1408

#3733

Lead Case # 09-50026

In Re:

MOTORS LIQUIDATION COMPANY, et. al

Debtors

(formerly General Motors Corp. et. al.)

)  
) Chapter 11  
) Case # 09-0950026  
) (Gerber)  
) Jointly Administered  
) August 5, 2009

SUPPLEMENTAL

MOTION TO GIVE ACCESS TO pro se Creditor to CERTAIN DOCUMENTS FILED UNDER  
SEAL, IN ADDITION TO DEPOSITIONS OF CERTAIN INDIVIDUALS ALREADY  
REQUESTED

Comes now Radha R.M. Narumanchi, a Creditor of Motor Liquidation Corp. (Formerly the General Motors Corporation) and the *pro se* Plaintiff in the adversarial complaint against Motors Liquidation Company (formerly known as GM) and submits as under:

1.0 I filed an appeal against the 7-5-2009 Order of this honorable Court on the Section 363 Sale of Assets. That appeal is currently pending before the U.S. District Court.

2.0 As already indicated in my previous Motion dated 7-23-2009 (Docket # 3642) I had duly designated the following documents in the said appeal:

A. Any depositions (including all exhibits thereof) taken of:

Harry Parker,  
Frederick Henderson,  
William C. Repko,  
J. Stephen Worth,  
Albert Koch, and  
Michael Raleigh.<sup>1</sup>

<sup>1</sup> It may be recalled here that as a *pro se* Creditor I was not given any access at all to any of the pre-evidentiary proceedings (that includes participating fully in depositions, discovery and requests for production of records) or even in the examination process of the witnesses during evidentiary hearings held on 6-30-2009, 7-2-2009 and 7-2-2009.

B. Evidentiary Hearing Transcripts dated 6-30-2009, including appropriate exhibits (Docket # 3087), 7-1-2009 (# 3205), and 7-2-2009 (# 3062).<sup>2</sup>

3.0 Now, in addition to the two depositions of **some unnamed individuals** that were filed **under seal** (vide docket #s 3287 and 3288 of the court, filed by attorney Jakubowski) I have also noticed today that under Docket #s 3404, 3407, 3408, 3409, 3410, 3411, 3412, 3413, 3414, 3419, 3420, 3421, 3422, 3424, 3435, 3436, 3427, 3428, 3429, 3430, 3431, 3432, 3433, 3434, 3435, 3437, and 3438, certain documents (Exhibits) were filed **under seal**, by attorneys for the debtor, to wit:

**Sealed Exhibits:**

Bondholder 1;  
Bondholder 2;  
Bondholder 3,  
PLCA 1,  
PLCA 2;  
IUE Binder # 1 (Exhibits 1 to 8); and  
IUE Binder # 2 (Exhibits 9 to 12)

4.0 **Most importantly, I would also need access to such exhibits or documents in order to enable me to fully answer the three sets of Motions to Dismiss filed by defendants<sup>3</sup> in my adversarial complaint # 09-00501.**<sup>4</sup>

5.0 I would, therefore, request this honorable court to order the release of the above noted documents to me as soon as possible.

Respectfully submitted.

Dated at New Haven, Conn. 06513, this 5<sup>th</sup> day of August, 2009.

..

---

<sup>2</sup> These documents are not to be released until 10-6-2009 as per the remarks noted in the said docket numbers.

<sup>3</sup> It may be noted here that the federal government defendants (five in number) have neither filed their appearances nor any motions.

<sup>4</sup> In view of this, by sending a copy of this motion, I am requesting all other parties in my adversarial complaint # 09-00501 to please consent for a deferral (or postponement) of the date for filing my responses to 10-30-2009 and a scheduled hearing on pre-trial hearing (as well as the motions to dismiss) to 12-2-2009 (or a date that is suitable to the court) and with some date suitable to all other parties for filing their pleadings.

CREDITOR (Interested Party) & *Appellant Pro Se*  
and Plaintiff *Pro Se* in Adversarial Complaint

(Radha R.M. Narumanchi)  
657 Middletown Avenue  
New Haven, Conn. 06513  
Phone: (203) 562-0536  
Email: [rrm\\_narumanchi@hotmail.com](mailto:rrm_narumanchi@hotmail.com)

**Certification**

This is to certify that a copy of the aforementioned was mailed by first class mail, postage paid this 5th day of August, 2009 to:

- 1) Weil, Gotshal & Manges LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, N.Y. 10153 - Attn: Harvey R. Miller/Stephen Karotkin/Joseph H. Smolinsky;
- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, Attorneys for the UAW, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
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- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 6060, Attn: Steve Jakubowski/Elizabeth Richert; and
- 10) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408

(Radha R.M. Narumanchi)

**Opposition briefs may be filed on or before 8-19-2009**

**No hearing is needed**

**Motion may be decided on submissions**

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, N.Y. 10004-1408

**Lead Case # 09-50026**

In Re:	)	
	)	Chapter 11
MOTORS LIQUIDATION COMPANY, et. al	)	<u>Case # 09-0950026</u>
	)	(Gerber)
Debtors	)	Jointly Administered
(formerly General Motors Corp. et. al.)	)	July 23, 2009

**MOTION TO GIVE ACCESS TO CERTAIN DOCUMENTS FILED UNDER SEAL  
AS WELL TO OTHER DOCKETED DOCUMENTS**

1.0 Comes now Radha R.M. Narumanchi, a Creditor of GM and one of appellants in the case<sup>1</sup> (appealing the decision and order dated 7-5-2009 issued by honorable Judge Gerber on Section 363 Sale). In the said papers filed by me, among other things, I have designated the following documents:

A. Any depositions taken of:

Harry Parker,  
Frederick Henderson,  
William C. Repko,  
J. Stephen Worth,  
Albert Koch, and  
Michael Raleigh.<sup>2</sup>

---

<sup>1</sup> My notice of appeal dated 7-7-2009 was docketed under # 3265, and my statement of issues and designation of contents dated 7-16-2009 was docketed under # 3266.

<sup>2</sup> It may be recalled here that as a *pro se* Creditor I was not given any access at all to any of the pre-evidentiary proceedings (that includes participating fully in depositions, discovery and requests for production of records) or even in the examination process of the witnesses during evidentiary hearings held on 6-30-2009, 7-2-2009 and 7-2-2009.

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2.0 I have noticed today that two depositions of **some unnamed individuals** were filed under seal, vide docket #s 3287 and 3288 of the court, by attorney Jakubowski. If any of the depositions filed by him in sealed envelopes contain depositions of any of the individuals identified earlier, in my appeal, no doubt I would like to have full access to them. **Hence, I would request this honorable court to give suitable instructions to the court staff to release such depositions for my viewing and copying.**

2.1 **I would also need such depositions in order to enable me to fully answer two sets of Motions to Dismiss filed by defendants<sup>4</sup> in my adversarial complaint # 09-00501.**<sup>5</sup>

Respectfully submitted.

Dated at New Haven, Conn. 06513, this 23<sup>rd</sup> day of July, 2009.

CREDITOR (Interested Party) & Appellant Pro Se

(Radha R.M. Narumanchi)  
657 Middletown Avenue  
New Haven, Conn. 06513  
Phone: (203) 562-0536  
Email: [rrm\\_narumanchi@hotmail.com](mailto:rrm_narumanchi@hotmail.com)

---

<sup>3</sup> These documents are not to be released until 10-6-2009 as per the remarks noted in the said docket numbers.

<sup>4</sup> It may be noted here that the federal government defendants (five in number) have neither filed their appearances nor any motions.

<sup>5</sup> In view of this, by sending a copy of this motion, I am requesting all other parties in my adversarial complaint # 09-00501 to please consent for a deferral (or postponement) of the date for filing my responses to 10-30-2009 and a scheduled hearing on pre-trial hearing (as well as the motions to dismiss) to 12-2-2009 (or a date that is suitable to the court) and with some date suitable to all other parties for filing their pleadings.

**Certification**

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- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, Attorneys for the UAW, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
- 5) Cohen, Weiss and Simon LLP, Attorneys for the UAW, 330 West 42<sup>nd</sup> Street, New York, N.Y. 10036 - Attn: Babette Ceccotti;
- 6) Vedder Price, P.C., Attorneys for Export Development Canada, 1633 Broadway - 47<sup>th</sup> Floor, New York, N.Y. 10019 - Attn: Michael J. Edelman/Michael L. Schein;
- 7) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> floor, New York, N.Y. 10004 - Attn: Diana G. Adams;
- 8) U.S. Attorney's General Office, S.D.N.Y., 86 Chambers Street - Third Floor, New York, N.Y. 10007 - Attn: David S. Jones/Matthew L. Schwartz.
- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 60601  
Attn: Steve Jakubowski/Elizabeth Richert.
- 10) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408

(Radha R.M. Narumanchi)